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By ECF

March 4, 2021

Honorable Ronnie Abrams  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Joseph Hunter, et al  
13 Cr. 521 (RA)

This letter is respectfully submitted to request a modification of the briefing schedule of the defendants' motions for a new trial. The motion is currently due on March 8. The reason for this request is that I am undergoing medical treatments which for the past few days have caused side effects rendering me unable to work. At the same time my co-counsel Robert J. Boyle is recovering from a stem cell transplant and, on doctor's orders, is remaining at home and cannot travel to the SCIF where the classified information is housed.

Counsel for the government and for co-defendants Stillwell and Samia have graciously consented to this request. Subject to the approval of the Court, the briefing schedule would be modified as follows: Defendants' Motion: March 15, 2021, Government's Response: April 5, 2021, Defendants' Reply: April 19, 2021.

Thank you for your kind attention to this matter.

Respectfully submitted,

/s/Andrew Patel  
Andrew G. Patel  
Attorney for Joseph Hunter

cc: All counsel (via ECF)

Application granted.

SO ORDERED.



Hon. Ronnie Abrams  
03/05/2021